

Danner, Ward

From: Wilson, Patrick
Sent: Friday, December 20, 2013 1:14 PM
To: Lyon, Sandra
Cc: Baylor, Katherine; Armann, Steve; Huetteman, Tom; Keener, Bill; Mogharabi, Nahal; Wilson, Patrick; Mark Katchen; Jennifer deNicola
Subject: Malibu High School Interim Cleanup Plan

Sent on behalf of S. Armann:

Dear Superintendent Lyon:

Thank you for the opportunity to review the district's interim subject work plan for Malibu High School. The plan, transmitted to EPA this morning titled "Limited PCB Remediation, Verification Sampling Work Plan for Malibu High School/Middle School" is appropriate for this project and is acceptable to **EPA only** with the conditions below.

As I mentioned at the board meeting on 12 December, the district's interim cleanup plan does not require EPA Approval.

Based on the information received this morning, and as we understand it, the plan generally involves the following:

- The plan covers pre- and post-sampling in certain rooms in building E, the library and music rooms.
- Pre cleaning air and wipe samples in rooms that were not previously sampled.
- HEPA vacuuming around windowsills, followed by wet cloth cleaning.
- Wet cleaning of all accessible surface areas (wall, floors, desks, etc).
- Post-sampling of air and surfaces (wipe sampling).
- Cleaning of the "ventilation" system will be limited to wet wiping. We understand that what has previously been referred to as a ventilation system in these particular rooms is actually a room heating system without any ducting.

Please note, EPA's acceptance of the plan is conditioned on the following:

- Verification sampling of the air (post-cleaning) be conducted as described in the plan with the additional requirement that all windows in the rooms tested shall be closed.
- Notification to EPA 72 hours prior to conducting verification air sampling. EPA will send a staff member from the San Francisco Region IX Office to be on-site. Our sampling & analysis expert will collect a limited number of independent samples to ensure quality control, and our staff member will also be on-site to review chain of custody procedures.

It is important to note that this interim plan is separate from the cleanup plan necessary to address PCB impacted caulk at Malibu H.S. The School District will need to submit, for EPA review and approval, a cleanup plan that will address the PCB impacted caulk in and around the buildings at Malibu High School. EPA looks forward to receiving that plan and will work with the Santa Monica-Malibu Unified School District to ensure the cleanup is efficient and effective.

Steven S. Armann, Manager
RCRA Corrective Action Office
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3352

Fax: 415-947-3533

Email: armann.steve@epa.gov